

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:

Broadcast Localism

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MB Docket No. 04-233

COMMENTS OF EDUCATIONAL STATION WMCO

1. The volunteers and staff of Radio Station WMCO respectfully submit these comments in the above-captioned proceeding.
2. The majority of the proposals supposedly advanced to increase “localism” as outlined in the “REPORT ON BROADCAST LOCALISM AND NOTICE OF PROPOSED RULEMAKING” (“NPRM”) contain extensive recordkeeping and paperwork requirements that are a particular burden to noncommercial broadcasters, like our station which is student run and has only 9 paid staff members. Our station is of limited financial means, and relies 75% exclusively on volunteer labor to operate. The paid students receive a monthly “stipend” for their work; however, contribute several additional hours to the station through airshows, sports broadcasts, and other remote broadcasts. To force stations like ours to comply with the extensive requirements set out in the NPRM may well be forcing these stations to do the impossible, as we simply have no means of complying with extensive paperwork requirements. If we are forced to comply, our station may not be able to operate, or may not be able to carry programming addressing community issues for which extensive documentation is required, thereby defeating the entire purpose of the FCC’s proceeding.
3. Thus, it is our opinion that, even if consideration of the majority of the proposal rules is not dropped for all radio stations, we respectfully request that Educational Stations (defined as FCC-licensed radio station, directly operated by, or affiliated with and officially sanctioned by a domestically accredited primary or secondary school, college, university

or other post-secondary degree granting educational institution that is not a "public broadcasting entity" under 17 USC 118(g) ("Educational Station") with less than 5 Full Time Employees) be exempt from these proposed rules because they present unduly burdensome new requirements on small, educational licensed facilities with extremely limited resources such as our station.

4. Our station already serves the public by providing unique programming to our community, and information to the students of the institution and surrounding area with which we are affiliated. Our coverage area spans for 20 miles, so our station serves more than just our academic grounds. For example, our institution resides in a small village, and covers local events such as election programming, community litter pick-up initiatives, summer music series, village holiday celebrations, and many collegiate/village-focused activities such as homecoming, student life activities, and weekly chapel services. We are the only radio station in the area to exclusively follow our sports teams—football, volleyball, men's and women's basketball, softball, and baseball—on a regularly basis, plus devote daily "sports updates" to cover collegiate athletics. We have increased our local news coverage over the past academic year through hourly updates within hourly 5-minute newscasts and air news wraps within our daily 30-minute weekday newscasts. As our staff is numerically and skillfully growing, our devotion to more local news and issues can only increase. It is these local experiences that prepare our staff to become better broadcasters and journalists.
5. Specifically, the following proposals would reduce our ability to produce programming of the sort envisioned by the NPRM due the amount of resources that would need to be dedicated to producing the documents and reports proposed as this work would be done by the same students and community volunteers that produce the programming who have limited time to commit to support our educational station.
 - Enhanced Disclosure forms
 - Placing our Public File on a web site

- Posting Renewal Application Pre- and Post-Filing Announcements on a web site
- Formation of and meetings with a Community Advisory Board
- Reporting Music Data and selection criteria

6. We are also concerned about the proposal to require our station to maintain a physical presence during all hours of operation, which at the moment is 24 hours a day/7 days a week. We take pride in being one of few campus mediums—aside from our cable-access television station—to maintain a 24-hour presence. We consider the proposal to be exceptionally contrary to the goals to “promote both localism and diversity”. We rely on automation capabilities to air programming in addition to live DJs, news, and sportscasters. Several hours per week are devoted to music, news, and on-air personalities in addition to syndicated programs. We do not have enough volunteers or fiscal resources to staff our air studio during all hours of operations. If this proposal would be passed, it would require our station to go off-air when we could not have someone present in the studio, therefore having the community we serve of “local” and “diverse” programming potentially see our station as inadequate—a term our staff does not believe in. Our station is growing semester to semester, which is great; however, with competition from other collegiate student activities and scholarly work, it becomes increasingly difficult to have a constant physical presence in the air studio, especially 6:00 a.m.-6:00 p.m. on weekends, and 12:00 a.m.-6:00 a.m. overnights. Student DJs are students first, and it would be unfair to ask students to be live from 12:00 a.m. to 6:00 a.m. As a broadcaster, but most importantly an educator, I cannot ask my student staff to have a physical presence in the middle of the night when time should be devoted to rest. We have a team of students devoted to the 6:00 a.m.-9:00 a.m. weekday shift, but to ask students to come in earlier would be unjust.

7. Further, if these rules were adopted, we might not be able to maintain minimum operating hours as per 73.561(b) which could subject the station to a time share proposal, which could otherwise be avoided or even worse, we might not be able to meet the requirements of 73.561(a) during periods of staff transitions when returning from “those days designated on the official school calendar as vacation or recess periods.”
8. We understand that College Broadcasters, Inc (“CBI”) will be submitting comments in this proceeding. We support those comments and incorporate them herein, by reference.

Respectfully submitted,

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Date: April 28, 2008